



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

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TDD: 217-782-9143

July 29, 2013



Larry Johnson, Associate Regional Counsel
Office of Regional Counsel
U.S. EPA, Region 5
77 W. Jackson Boulevard, C-14J
Chicago, Illinois 60604

Re: Inverse Investments
LPC #1110605163

Dear Larry:

Following our phone conversation, I was asked to confirm in writing the State of Illinois's position on the referral made to your office on the above-named matter. On April 29, 2013, Illinois EPA referred two matters to U.S. EPA Region 5 for consideration for time-critical removal, due to contaminants in private drinking water wells (*see attached*). The first matter involved benzene from an unknown source; the second involved solvent contamination from what is now known as the Inverse Investments, LLC ("Inverse") property.

With respect to Inverse, the Illinois Attorney General's Office ("AGO") has been pursuing enforcement against the site in an attempt to achieve remediation as well as to address the contaminated drinking water, as stated in our referral. Illinois EPA and the AGO have been working cooperatively in this matter, and a priority for the State was to find an alternative source of drinking water for affected homes in a timely manner. The AGO did not object to our time-critical referral to U.S. EPA to address this issue, because it appeared to be the most expedient means to this end. The enforcement case against Inverse Investments is still pending before the Illinois Pollution Control Board (PCB 11-79), and the AGO wants to move forward with the remaining issues in the case, now that the immediate concern of residential drinking water is being handled by your office. These issues include remediation and penalties. At the time of the April 29, 2013 referral to U.S. EPA, those issues remained with the AGO, and for that reason were not made part of the referral.

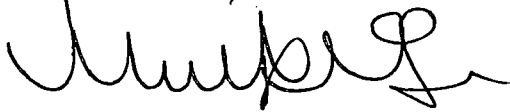
Inverse Investments, LLC

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I hope this clarifies the scope of the time-critical referral with respect to the Inverse site.
Please let me know if there is anything else you need from Illinois EPA.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle M. Ryan". The signature is fluid and cursive, with a large initial "M" and a stylized "R".

Michelle M. Ryan
Assistant Counsel



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April 29, 2013

Mike Ribordy
Chief, Emergency Response Section 2
Emergency Response Branch 2
U.S. EPA, Region 5
77 West Jackson Boulevard, SE-5J
Chicago, IL 60604

Re: Private Well Contamination
LPC# 1110605261 – McHenry County
SF/Tech

Inverse Investments
LPC# 1110605163 – McHenry County
ST/Tech

Dear Mr. Ribordy:

I am requesting the Region 5 Offices of the United States Environmental Protection Agency (U.S. EPA) consider time-critical removal actions at two additional areas of contaminated drinking water located in McHenry, McHenry County, Illinois.

Past investigations by Illinois EPA and McHenry County Public Health Department identified three areas of groundwater contamination within McHenry. One of the plumes is located north of Illinois Route 120 and was referred to U.S. EPA on November 19, 2012. The other two areas of groundwater contamination is the subject of this time-critical removal referral.

Private Well Contamination

On July 18, 2012, representatives from the McHenry County Department of Health (MCDH) collected a water sample from a private well located at 2907 Route 120 in McHenry. A strong petroleum odor was documented at the time of sampling. The analysis of the sample indicated that Benzene was detected at 57.4 ppb. A month later, MCDH confirmed the results and detected Benzene at 57.6 ppb. The resident was subsequently notified by MCDH and it was recommended to them to use an alternate water supply for drinking and cooking. A packet of information, including the sampling results, is attached to this referral.

The affected residential drinking water well is located east of two chlorinated solvent groundwater plumes within McHenry just south of Route 120. At this time, the source of Benzene contamination is not known. According to information obtained from the MCDH, the drinking water well may be approximately 20 feet below ground surface. Additional wells have been sampled in the area, but at this time this has been the only well with levels of Benzene above Maximum Contaminant Levels (MCL).

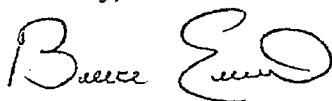
Inverse Investments

Prior investigations identified a chlorinated solvent groundwater plume located south of Illinois Route 120. This plume appears to be associated with a former drycleaner located at 3004 West Illinois Route 120 and is a separate plume to that found north of Illinois Route 120. Within this groundwater plume, there is one drinking water well that exceeded the MCL for Perchloroethylene (PCE) and another home exceeded the MCL for Vinyl Chloride (VC). Since it was originally identified by Illinois EPA, the Illinois Attorney General's Office has been pursuing a negotiated clean-up with the former drycleaner. It appears at this time that those negotiations have been unsuccessful. On April 16, 2013, the Illinois Attorney General's Office informed Illinois EPA that they do not object to a time-critical removal referral for the plume located south of Illinois Route 120.

If needed, Illinois EPA would be willing and able to provide assistance to U.S. EPA with sampling activities and/or field investigations. Please contact Tom Rivera at (847) 294-4079 or myself at the above number if you would like assistance from Illinois EPA.

Thank you for your continued support and we look forward to hearing from U.S. EPA for this project and future removal activities.

Sincerely,



Bruce Everetts
Office of Site Evaluation
Division of Remediation Management
Bureau of Land

bcc: Division File, w/ attachments
Sam Borries, U.S. EPA, w/o attachments, via e-mail
Carol Fuller, OCR, w/o attachments, via e-mail
Dean Studer, OCR, w/o attachments, via e-mail

U.S. ENVIRONMENTAL
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AUG 01 2013

OFFICE OF REGIONAL
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